

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,  
Plaintiff,

v.

MICROSOFT CORPORATION, *et al.*,  
Defendants.

Case No. 1:23-cv-11195-SHS-OTW  
Case No. 1:24-cv-3285-SHS-OTW  
Case No. 1:24-cv-04872-SHS-OTW

Hon. Sidney H. Stein

**NOTICE OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

DAILY NEWS, *et al.*,  
Plaintiffs,

v.

MICROSOFT CORPORATION, *et al.*,  
Defendants.

THE CENTER FOR INVESTIGATIVE  
REPORTING, INC.,

Plaintiff,

v.

OPENAI, INC., *et al.*,  
Defendants.

Pursuant to Rule 1.3(i) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Michael S. Kwun, hereby move this Court for an order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI Inc., OpenAI LP, OpenAI LLC, OpenAI GP LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation LLC, OpenAI Holdings LLC, OpenAI Startup Fund I LP, OpenAI Startup Fund GP I LLC, and OpenAI Startup Fund Management LLC in the above-captioned action. I am a member in good standing of the bar of the State of California, and a certificate of good standing is attached hereto as Exhibit A. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached a declaration pursuant to Local Rule 1.3(k).

Respectfully submitted,

KWUN BHANSALI LAZARUS LLP

Dated: February 20, 2025

By: /s/ Michael S. Kwun  
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Attorney for Defendants  
 OpenAI Inc., OpenAI LP, OpenAI LLC,  
 OpenAI GP LLC, OpenAI OpCo LLC,  
 OpenAI Global LLC, OAI Corporation  
 LLC, OpenAI Holdings LLC, OpenAI  
 Startup Fund I LP, OpenAI Startup Fund GP  
 I LLC, and OpenAI Startup Fund  
 Management LLC